

1 THE HONORABLE RICARDO S. MARTINEZ
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 QUNESHIA RAWLS, individually and on
12 behalf of all others similarly situated,

13 Plaintiffs,

14 v.

15 CONVERGENT OUTSOURCING, INC.,

16 Defendant.

Case No. 2:20-cv-01538-RSM

**JOINT STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

17 **I. STIPULATION**

18 Pursuant to LCR 7, Plaintiff QUNESHIA RAWLS and the opt-in Plaintiffs, by and
19 through their counsel, Frank Freed Subit & Thomas, LLP and Anderson Alexander, PLLC, and
20 Defendant CONVERGENT OUTSOURCING INC., by and through its counsel, Jackson Lewis
21 P.C., hereby stipulate and jointly move this Court for an order extending the deadline for
22 Defendant to file and serve its Response to Plaintiff's Complaint from January 8, 2021, to March
23 19, 2021, so that the parties can continue their efforts to engage in good faith efforts to explore
24 the resolution of this action. The parties are in the process of negotiating a confidentiality
25 agreement and exchange of documents and information to further their resolution efforts, as well
26 as securing a date for mediation in or about May 2021, in the event their direct efforts at
27 negotiating a resolution fail.

28 JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO
COMPLAINT - 1
(Case No. 2:20-cv-00888-RSM)

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1 The parties stipulate that good cause exists under LCR 7, Fed. R. Civ. P 16(b)(2), and
2 LCR 16(b) to continue the above-referenced deadlines because the parties have agreed to engage
3 in a near term, good faith exploration of a resolution of this matter that could obviate any further
4 proceedings. The parties likewise stipulate that the requested extension promotes the policy
5 supporting the voluntary resolution of disputes and preservation of judicial resources, and would
6 facilitate an orderly administration of justice. Furthermore, Defendant's lead counsel is the sole
7 caregiver for a family member who had lung surgery for cancer in August 2020, and who has
8 been suffering from Covid-19 and related complications since early December 2020, with those
9 family duties impeding the parties' ability to move forward with resolution efforts late last year,
10 following their earlier extension.

11 This Stipulation is based upon the following, and the parties agree:

12 1. That this request is made in good faith and not for the purpose of delay.
13 2. That nothing in this Stipulation, nor the fact of entering the same, shall be
14 construed as waiving any claim and/or defense held by any party.

15 **IT IS SO STIPULATED.**

16 DATED this 8th day of January, 2021.

17 FRANK FREED SUBIT & THOMAS LLP

18 JACKSON LEWIS P.C.

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30 Members

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JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO
COMPLAINT - 3
(Case No. 2:20-cv-00888-RSM)

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II. ORDER

Pursuant to the above stipulation, it is SO ORDERED.

DATED this 11th day of January, 2021.


RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE